

**REMARKS**

Claims 1-8 are pending. Claims 2, 5 and 7 have been amended.

Reconsideration and allowance of the present application based on the following remarks are respectfully requested.

***Priority***

Applicant herewith submits a certified copy of the Korean application No. 2000-82179 as requested by the Examiner. Please have it recorded.

***Claim Objection***

Claim 2, 5, and 7 were amended and submitted herewith in order to provide proper antecedent basis pursuant to the Examiner's request.

***Claim Rejections Under 35 U.S.C. § 103***

Claims 1-3 and 5-8 were rejected under 35 U.S.C. § 103(a) over Okamoto et al. (U.S. Patent No. 5,317,508) in view of Mauldin et al. (U.S. Patent No. 5,664,227). Applicant respectfully traverses this rejection for following reasons.

Claim 1 recites, in part, a color/shape threshold storing means for storing color histograms mapped to color related words and edge information corresponding to shape related words. In the present invention, the color and the shape threshold database 15 is constructed by storing threshold values of the color related information and the shape related information of the image by color/shape threshold database constructing unit 16 as described in Fig.1 and page 8, lines 7 to 16. Further, this color/shape threshold storing means stores a default color palette and a user-defined palette which can be inputted by a user. However, Okamoto et al. fails to disclose or suggest the color/shape threshold storing means. "Language-Image-Writing

Dictionaries” in Fig. 1 of Okamoto et al. does not refer to “a color/shape threshold strong means.” The “Language-Image-Writing Dictionaries” is functioning as a natural language dictionary, which rather corresponds to “Dictionary Storage Unit” 12 in Fig. 1 of the present invention. The Examiner is invited to point out any other passages of Okamoto et al. which describe or teach the color/shape threshold storing means of claim 1.

Moreover, Claim 1 also recites, in part, a color/shape database constructing means for mapping and storing color related words and storing edge information corresponding to shape related words. Okamoto et al. fails to disclose or suggest this feature. Col. 2, lines 20-23 of Okamoto et al. merely describe a fourth “storing means to store the relation between the information stored in the first and the second storing means, if any relation exists.” It apparently differs from the “constructing means which is mapping and storing color related words and storing edge information.” The Examiner is also invited to point out any other passages of Okamoto et al. which describe or teach the color/shape database constructing means of claim 1.

Finally, Applicant submits that Mauldin et al. does not supply the above-noted deficiencies of Okamoto et al. In addition, in an obviousness rejection, the motivation to combine the references must be “clearly and particularly” taught in the references. In re Dembiczak, 175 F.3d 994, 999 (Fed. Cir. 1999). The Examiner points to no teaching or suggestion in the prior art to combine the image editing apparatus of Okamoto et al. with the system and method for skimming digital audio/video data of Mauldin et al. As a result, Okamoto et al. and Mauldin et al. could not be combined as suggested by the Examiner.

At least for the reasons stated above, Applicant submits that claim 1 is not made obvious over Okamoto et al. in view of Mauldin et al. under 35 U.S.C. §103(a).

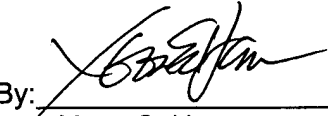
Claims 5 and 7 are method claims corresponding to the apparatus claim 1. Accordingly, claims 5 and 7 are believed allowable for at least the same reasons presented above with respect to claim 1. Also, claims 2, 3, 4, 6, 8 are believed allowable by virtue of their dependence upon claims 1, 5, and 7. Accordingly, Applicants respectfully request reconsideration and withdrawal of this rejection.

### **Conclusion**

All objections and rejections having been addressed, it is respectfully submitted that all of pending claims 1-8 are now in condition for allowance and a notice to that effect is earnestly solicited. If any issues remain to be resolved, the Examiner is cordially invited to telephone the undersigned attorney at the number listed below.

Respectfully submitted,

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Date: April 26, 2006